

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

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Application of

UNITED AIRLINES, INC.

for renewal of exemption under 49 U.S.C. § 40109  
(mail-only codeshare with Aegean Airlines)  
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: Docket DOT-OST-2018-0122  
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APPLICATION OF  
UNITED AIRLINES, INC. FOR  
RENEWAL OF AN EXEMPTION

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May 20, 2022

Counsel for  
United Airlines, Inc.



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APPLICATION OF  
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United<sup>1</sup> applies, pursuant to 49 U.S.C. § 40109 and Subpart C of the Department of Transportation’s Rules of Practice (14 C.F.R. Part 302), for renewal of its exemption authority to provide scheduled foreign air transportation of mail between any point or points in the United States and any point or points in the European Union on Aegean Airlines flights. United requests that this renewed exemption authority be effective for a period of at least two years consistent with Department precedent.

United respectfully states as follows in support of this application:

1. United is a corporation organized under the laws of the State of Delaware with its principal place of business at 233 South Wacker Drive, Chicago, IL 60606.

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<sup>1</sup> Common names are used for airlines.

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2. United is a citizen of the United States as that term is defined in 49 U.S.C. § 40102(a)(15)(C). United holds various certificates of public convenience and necessity and exemptions authorizing it to engage in scheduled air transportation of persons, property and mail between the U.S. and foreign countries, and United is fit, willing and able to provide the service for which it seeks renewal. *See, e.g.*, Orders 2013-4-11 (reissuing United/Continental authorities to United), 2011-3-14 (United/Continental route transfer), 2007-4-19 (Blanket Open Skies), and Notice of Action Taken dated May 14, 2019, in Docket DOT-OST-2004-19148 (blanket worldwide codesharing). United requests that the Department take official notice, pursuant to Rule 24 of its Rules of Practice, of all data filed to date to establish United's fitness.

3. United's exemption authority to provide scheduled foreign air transportation of mail between any point or points in the United States and any point or points in the European Union on Aegean Airlines flights was originally granted by Notice of Action Taken dated August 23, 2018, and renewed by Notice of Action Taken July 22, 2020, in this docket. United requires renewal of its exemption authority to continue to hold out service. United's exemption authority will expire on July 22, 2022.

4. Aegean Airlines holds a blanket statement of authorization to display United's "UA\*" designator code on flights that Aegean Airlines operates for the limited purpose of allowing United to transport U.S. mail (i) between points in the United States and points in the European Union ("EU"), directly and via intermediate points; (ii) between EU points; (iii) between points in Greece; (iv) between points in the EU and points in Greece and points in the European Common Aviation Area ("ECAA") where an open-skies agreement is being applied; (v) between the EU or Greece and any open-skies point or points; and (vi) beyond the EU or Greece to any point or points. *See* Notice of Action Taken dated August 23, 2018, Docket DOT-OST-2018-0122. Aegean

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Airlines also holds a Foreign Air Carrier Permit to engage in foreign scheduled and charter air transportation of persons, property and mail to the extent necessary to permit mail-only codeshare operations within the EU and between the EU and third countries. *See* Order 2010-9-19.

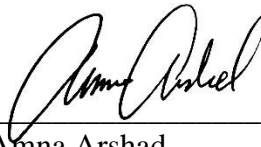
5. Approval of this application is in the public interest and will provide significant benefits to mail customers in these markets. Approval of this application will also provide United with a cost-efficient means of offering such mail transportation services.

6. Approval of this application is fully consistent with United's Civil Reserve Air Fleet commitments. In addition, grant of the requested authority will not cause a near-term net annual change in United's aircraft fuel consumption of 10 million gallons or more and will not, therefore, constitute a major regulatory action under Part 313 of the Department's Procedural Regulations.

7. United invokes the automatic extension provisions of 5 U.S.C. § 558(c), as implemented by Part 377 of the Department's Special Regulations, to maintain existing exemption authority pending action on this renewal application to continue this exemption authority in effect pending action on this renewal application. United's renewal application is timely filed under Part 377.

WHEREFORE, United respectfully requests the Department to renew its exemption authority to provide scheduled foreign air transportation of mail between any point or points in the United States and any point or points in the European Union on Aegean Airlines flights, and to grant such other relief as the Department deems necessary or appropriate.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Anna Arshad', is written over a horizontal line.

Anna Arshad  
Benjamin Sanchez  
Freshfields Bruckhaus  
Deringer US LLP


Counsel for United Airlines, Inc.

May 20, 2022

## CERTIFICATE OF SERVICE

I certify that I have this date served the foregoing document on the following persons in accordance with the Department's Rules of Practice:

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May 20, 2022